

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

*Richmond Division*

RENEE GALLOWAY *et al.*,

Plaintiffs,

v.

JUSTIN MARTORELLO *et al.*,

Defendants.

Case No. 319-cv-314

**DEFENDANT REBECCA MARTORELLO'S MEMORANDUM IN OPPOSITION TO  
PLAINTIFFS' MOTION TO ENFORCE COMPLIANCE WITH SECTION 3.5 OF THE  
SETTLEMENT AGREEMENT**

Defendant Rebecca Martorello now submits her memorandum in opposition to Plaintiffs' Motion to Enforce Compliance with § 3.5 of the Settlement Agreement, ECF No. 680. Mrs. Martorello remains fully committed to this class settlement proceeding and will attend in person the November 13 settlement conference with her attorney, Magistrate Judge Colombell, and Plaintiffs' counsel. She travels to Richmond with the hope that the parties can come to an agreement that will preserve the Stipulation and Agreement of Settlement, ECF No. 649-1 [REDACTED]

[REDACTED] That said, Mrs. Martorello opposes Plaintiffs' request for a court order [REDACTED]

[REDACTED] The requested order, if issued, would exceed the bounds of the Settlement Agreement.

[REDACTED]

Mrs. Martorello does not dispute that the Court has jurisdiction to enforce the Settlement Agreement. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] the Court should decline the Plaintiffs request to exceed the Agreement's scope in this manner.

For these reasons, the Court should deny the Plaintiffs' motion. [REDACTED]

[REDACTED]

[REDACTED]

Respectfully submitted,

Rebecca Martorello

By: /s/  
William B. Jackson (VSB No. 84012)  
Jackson Lewis P.C.  
500 E. Main St., Suite 800  
Norfolk, Virginia 23510  
(757) 648-1445 Telephone  
(757) 648-1418 Facsimile  
billy.jackson@jacksonlewis.com

CERTIFICATE OF SERVICE

I certify that on this 8th day of November, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/

---

William B. Jackson (VSB No. 84012)  
Jackson Lewis P.C.  
500 E. Main St., Suite 800  
Norfolk, Virginia 23510  
(757) 648-1445 Telephone  
(757) 648-1418 Facsimile  
billy.jackson@jacksonlewis.com